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Public Service Commission of Wisconsin
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The Wisconsin Utilities Association ("WUA") Energy Efficiency & Renewable Energy Committee appreciates the opportunity to provide comments on the scope of the energy efficiency and renewable resource quadrennial planning process for the 2015-2018 period. WUA has two comments.

First, the specific issue on which the PSCW notice seeks comments is whether water efficiency measures should be incorporated into the Focus on Energy program. WUA takes no position on the merits of water efficiency, however this topic is outside of the scope of the statutory public benefits program and WUA believes that legislation would be required in order to redefine the scope and participants in the program or to create a separate water efficiency program. WUA would oppose a water efficiency program funded with dollars collected from electric customers without regard to their water usage and one that did not include the participation of water utilities.

Second, the WUA urges the PSCW to review its previous decisions on the quadrennial planning process and determine if they remain appropriate in the current environment. The natural gas markets have been evolving with the evolution of shale gas and horizontal drilling and fracking technologies and environmental regulations continue to evolve as well.

Revisiting the discount rate used for energy savings in future years, the value of \$30/ton for CO₂, and long-term electricity pricing would be appropriate and recommended.